

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Southern Division)

JAMES HERBERT BOYD, JR., *et al.*,

Plaintiffs,

v.

SFS COMMUNICATIONS, LLC, *et al.*,

Defendants.

Case No. 8:15-cv-03068-PJM

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs James Boyd, Jr., John Poles, Steven Borden, and Courtney Wilson, by and through undersigned counsel, pursuant to Federal Rule of Civil Procedure 23, hereby move for class certification of a class consisting of all individuals employed directly by SFS Defendants from September 24, 2012 until July 1, 2018 who performed cable installation work in Maryland for CUI Defendants. As grounds for this motion, Plaintiffs submit the accompanying memorandum of law in support thereof and exhibits thereto.

WHEREFORE, Plaintiffs request that their Motion for Class Certification be granted. Specifically, Plaintiffs request that the Court certify a class of all individuals employed directly by SFS Defendants from September 24, 2012 until July 1, 2018 who performed cable installation work in Maryland for CUI Defendants; authorize notice of the certification to the class by mail and email pursuant to Rule 23(c)(2)(B); approve the form of the notice attached as Exhibit 21 to Plaintiffs' memorandum of law in support of the Motion; and order CUI Defendants to produce a list in Excel or other electronic manipulable format containing the names, employee or technician identification numbers, last known addresses, phone numbers, emails, and the last

four digits of their social security numbers for all class members within 10 days of the ruling granting class certification for the limited purpose of sending notice to class members.

Date: March 29, 2019

Respectfully submitted,

s/ Sam J. Smith

Sam J. Smith

Loren B. Donnell

BURR & SMITH, LLP

111 2nd Avenue NE, Suite 1100

St. Petersburg, Florida 33701

(813) 253-2010

ssmith@burrandsmithlaw.com

ldonnell@burrandsmithlaw.com

Omar Vincent Melehy

Andrew Balashov

MELEHY & ASSOCIATES LLC

8403 Colesville Road, Suite 610

Silver Spring, Maryland 20910

(301) 587-6364

ovmelehy@melehylaw.com

abalashov@melehylaw.com

Joseph B. Espo

Jessica P. Weber

BROWN, GOLDSTEIN & LEVY, LLP

120 East Baltimore Street, Suite 1700

Baltimore, Maryland 21202

(410) 962-1030

jbe@browngold.com

jweber@browngold.com

Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2019 a copy of the foregoing was served via ECF to counsel of record.

/s/ Sam J. Smith _____
Sam J. Smith